

**REMARKS**

Applicant appreciates the courtesy extended by the Examiner during the interview on July 7, 2004.

The Office action of May 19, 2004 has been received and its contents carefully noted.

Claims 1-17 are pending in the application. Claims 1, 8, and 16-17 have been amended. Claims 2-7, and 9-15 have been deemed allowable.

Claims 1 and 16 stand rejected under 35 U.S.C. § 102(b) as being unpatentable over Yokoyama (U.S. Patent No. 6,014,095). Claims 8 and 17 stand rejected under § 102(b) as being unpatentable over Fukuzawa (U.S. Patent No. 5,933,536). Applicant respectfully traverses these rejections, and requests allowance thereof in the continuation prosecution application for the following reasons.

**The Claims are Patentable Over the Cited References**

**Claims 1 and 16 are not anticipated by Yokoyama**

Claims 1 and 16 stand rejected under § 102(b) in view of Yokoyama. Yokoyama fails to disclose the features recited in these claims as amended such as a run-length converter for converting block data consisting of a plurality of image signals into combined data in accordance with a scanning sequence, a variable length encoder for reading a variable length code and its code length from a table memory in accordance with the combined data converted by

said run-length converter, wherein said run-length converter and said variable length encoder being physically distinct from each other.

Yokoyama makes no mention of this feature as in contrast Yokoyama discloses a variable length encoding system using a single device, variable length encoder 11 (see FIGs. 5, 6), to perform the steps of determining/counting coefficients, storing a variable length code, and performing the variable length coding in contrast to the recited plurality of devices of a run-length converter, table memory, and variable length encoder to perform these features where the variable length encoder and the run-length converter are physically distinct from each other.

Yokoyama does not disclose a run-length converter being physically distinct from a variable length encoder as recited making the claimed invention patentably distinct and non-obvious from the cited reference.

**Claims 8 and 17 are not anticipated by Fukuzawa**

Claim 8 stands rejected under § 102(b) in view of Fukuzawa. Applicant strongly contends that Fukuzawa fails to disclose the features recited in these claims as amended such as a bit stream register, a table memory for storing a code length, a data reader for reading a predetermined number of bits from said bit stream register, an address generator for generating an address of said

table memory from data read from said data reader, and a variable length decoder for reading data from the address of said table memory generated by said address generator, wherein said variable length decoder being physically distinct from said bit stream register, table memory, data reader, and address generator.

Similar to Yokoyama, Fukuzawa omits the recited feature and instead discloses a single device, variable length decoder 203 (see FIGs. 3-5), to perform the functions of recovering/counting coefficients, and storing a length of a variable length code in contrast to the recited plurality of devices including a bit stream register, a data reader, an address generator, and a variable length decoder, physically distinct from all the other devices, to perform these features.

Therefore, Fukuzawa fails to disclose a variable length decoder physically distinct from the other components as recited making the claimed invention patentably distinct and non-obvious from the cited reference.

### **Conclusion**

In view of the amendments and remarks submitted above, it is respectfully submitted that all of the remaining claims are allowable and a Notice of Allowance is earnestly solicited.

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies to charge payment or credit any overpayments to Deposit Account No. 02-2448 for any additional fees

required under 37 C.F.R. §§1.16 or 1.17; particularly, extension of time fees.

The Examiner is invited to contact the undersigned at (703) 205-8000 to discuss the application.

Respectfully submitted,

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